

# EXHIBIT 92

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et. al.*,

Plaintiffs,

v.

DONALD TRUMP, *et. al.*,

Defendants,

No. 1:17-CV-5228

Pursuant to 28 U.S.C. § 1746(2), I, Rich Jones, hereby declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I am employed at Washington State Office of the State Treasurer (OST). My job title is Human Resources Manager and my job description is the responsibility for the management, support, development and implementation of human resources activities and programs and oversight of the organizations most sensitive and complex human resource issues. I manage, supervisor, mentor and guide Human Resource staff in their performance and application of human resources and serve as a member of the Executive Leadership Team.
3. There is one employee at Washington State Office of the State Treasurer who is a recipient of Deferred Action for Childhood Arrivals (DACA).
4. The one DACA recipient is employed as a Senior Secretary in our Administration Division. That employee's job description is to support the organization's mission by performing varied and complex administrative and secretarial functions for the agency's Administration, Debt Management and Investments Divisions within the OST Legislative Building offices. Importantly, this position serves as the first point of contact ensuring communications with the public and other agency visitors/guests to include government officials and legislative leaders shows our commitment to being a transparent and professional organization.
5. The Washington State Office of the State Treasurer spends time and resources to recruit, hire, train, and supervise employees. When any employee departs, it creates disruption for our agency and costs us time and resources to replace and train that person. Moreover, as a small and principal state agency, the loss of a front office staff can create strain and stress on an area of the office that has been developed to operate effectively and efficiently with a minimal staffing level.
6. The termination of DACA will be disruptive to operations and cause us to expend additional resources.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1 day of September, 2017



Rich Jones, Human Resource Manager